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ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: §
§
PAULINE CORONADO-NEWTON § **CASE NO. 20-33047-HDH-13**
§
Debtor § **CHAPTER 13**

ANDY SOTO § **HEARING DATE: 9/1/2021**
§ **HEARING TIME: 1:30 PM**
Movant §
§
vs. §
§
PAULINE CORONADO-NEWTON §
§
Debtor §

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Debtor, Pauline Coronado-Newton, in the above-styled and numbered case and file this, her Response to the Motion for Relief from Automatic Stay filed by Andy Soto, ("Movant") in regard to the collateral referenced in Movant's Motion.

Debtor would respectfully show:

1. The allegations of Movant contained in paragraphs 1-2 of the Motion are admitted.
2. The allegations of Movant contained in paragraphs 19-20 and 22 of the Motion are denied.

3. The allegations of Movant contained in paragraphs 3-18 and 21 of the Motion may not be admitted or denied as the Debtor is without sufficient knowledge or information to form a belief as to the truth and therefore make a qualified denial.

WHEREFORE, PREMISES CONSIDERED, Respondent prays Movant's Motion for Relief from Automatic Stay be denied and for any such other and further relief in law and equity as the Court deems just.

DATED: August 23, 2021

Respectfully Submitted,

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By: /s/ Marcus Leinart
Marcus Leinart
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CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2021, I did serve a true and correct copy of the foregoing to the following interested parties, by United States Mail, First Class, and to those parties notified electronically:

DEBTOR

Pauline Coronado-Newton
4507 N O'Connor RD, # 2143
Irving, TX 75062

OPPOSING COUNSEL

Norred Law, PLLC
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CHAPTER 13 TRUSTEE

Tom Powers
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UNITED STATES TRUSTEE

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By: /s/ Marcus Leinart
Marcus Leinart
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